

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re:)
Application of Storag Etzel GmbH for an) Case No.:
Order, Pursuant to 28 U.S.C. § 1782, to Obtain)
Discovery for Use in a Foreign Proceeding)

**CONFIDENTIAL
FILED UNDER SEAL**

DECLARATION OF TIMOTHY P. HARKNESS

Pursuant to 28 U.S.C. § 1746, I, Timothy P. Harkness, declare:

1. I am a Partner with the law firm of Freshfields Bruckhaus Deringer US LLP, attorneys for applicant Storag Etzel GmbH ("Applicant") in the above-referenced matter.
 2. Annexed hereto as Exhibit A is a true and correct copy of the proposed subpoena requesting documents that Applicant seeks permission to serve upon Baker Hughes, a GE Company, LLC ("Respondent") pursuant to 28 U.S.C. § 1782.
 3. Annexed hereto as Exhibit B is a true and correct copy of the proposed subpoena requesting deposition testimony that Applicant seeks permission to serve upon Respondent pursuant to 28 U.S.C. § 1782.
 4. Annexed hereto as Exhibit C is a true and correct copy of *In re Application of Reliance Flag Telecom Ireland Ltd and Reliance Globalcom Ltd.*, No. 18-mc-00179 (D. Del. Jun. 14, 2018), Order, D.I. No. 5, provided pursuant to D. Del. LR 7.1.3(7).
 5. Annexed hereto as Exhibit D is a true and correct copy of *In Re: Application of Stadtwerke Frankfurt Am Main Holding GmbH*, No. 19-mc-00001 (S.D. Ga. Feb. 27, 2019), Order, D.I. No. 3, provided pursuant to D. Del. LR 7.1.3(7).

6. Annexed hereto as Exhibit E is a true and correct copy of *In re Application of Stadtwerke Frankfurt Am Main Holding GmbH*, No. 19-mc-00035(JMF) (S.D.N.Y. Jan. 31, 2019), Order, D.I. No. 8, provided pursuant to D. Del. LR 7.1.3(7).

I declare under penalty of perjury that the foregoing is true and correct.

Executed August 26, 2019

By: _____

Timothy P. Harkness